

# 1. Purpose and Commitment

Bloq.it Group (Bloq.it) provides end-to-end solutions for Smart Lockers.

Bloq.it is committed to maintaining the highest standards of integrity, ethics, and accountability, ensuring trusted, transparent, and compliant business practices.

Bloq.it expects all of its suppliers to adhere to the same ethical standards. For this purpose, Bloq.it has developed this Supplier Code of Conduct, which establishes the minimum standards for conducting business with any Group company or Business Unit. This document applies to all suppliers that Bloq.it engages.

A copy of this policy will be available on Bloq.it's website.

# 2. Supplier Responsibilities

## **LAWS AND ETHICAL STANDARDS**

The supplier shall comply with the relevant laws applicable to its business sector. The supplier shall support the principles of the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises as well as the 1998 International Labor Organisation Declaration on Fundamental Principles and Rights at Work, in accordance with national laws and good practices.

## **CHILD LABOR**

The supplier shall not employ children under the legal age of employment in any country or local jurisdiction.

The supplier shall apply a minimum working age of 15 years, even where local legislation permits younger children to be employed. The Supplier shall ensure that workers under the age of 18 shall only perform work in accordance with legal requirements of their country of employment and subject to any requirement regarding education or training.

## **FORCED LABOUR**

The supplier shall not use any form of forced, bonded, compulsory labour or modern forms of slavery. All labour will be voluntary. Workers must be allowed to maintain control over their identification documents. The supplier shall ensure that workers do not make any payment to obtaining employment throughout the hiring process and the employment period. Punishment, mental or physical coercion as well as any other form of human trafficking are prohibited. The supplier will define and communicate to his work force disciplinary policies and procedures.

## **COMPENSATION AND WORKING HOURS**

The supplier shall comply with all applicable local laws and industry standards related to working hours, including overtime, breaks and vacation.

The supplier shall pay its workers in accordance with local minimum wage legislation and terms of applicable collective bargaining agreements as well as with market standards. The supplier shall pay workers in a timely manner and clearly convey the basis on which workers are being paid. Deductions from wages as a disciplinary measure shall not be allowed, if not allowed by law.

**FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

The workers of the supplier must be free to join or not to join a union/employee representation of their choice, free from threat or intimidation. The supplier shall respect the right to collective bargaining accordance with applicable laws.

**DIVERSITY AND INCLUSION**

The supplier shall promote an inclusive work environment that values diversity. The supplier shall commit to equal opportunities and not tolerate discrimination or harassment with respect to gender, ethnic, national origin, race, colour, religion, age, disability, sexual orientation and identity, or any other characteristic as protected by the law.

**HEALTH & SAFETY**

The supplier shall implement the standards of occupational health and safety at a high level. The supplier shall comply with applicable occupational health and safety regulations and ensure a work environment that is safe and conducive to good health. This includes regular workplace risk assessments and the implementation of adequate hazard control and precautionary measures, including the provision of appropriate Personal Protective Equipment (PPE). Employees are to be adequately trained in health and safety issues in a language they understand.

**DATA PROTECTION, INFORMATION SECURITY, AND DISCLOSURE OF INFORMATION**

The supplier shall comply with applicable data protection legal framework, including security of personal data, as well as to respective regulation, in particular with regard to personal data of customers, consumers, employees and shareholders.

The supplier will take account of the need to protect the confidentiality, integrity and availability of information. The supplier shall safeguard and make only appropriate use of confidential information. The supplier shall comply with any contractual requirements on this matter and shall not disclose any information that is not known to the general public.

**BRIBERY AND CORRUPTION**

The supplier shall comply with all applicable national and international anti-corruption laws and regulations. The supplier shall not, directly nor indirectly, offer, provide or accept anything of value to improperly influence an official act or to secure an improper advantage in order to obtain or retain business. This includes so-called facilitation payments or other benefits provided to public officials for routine non-discretionary actions.

**TRADE REGULATION**

The supplier shall comply with all applicable export control, sanctions and customs laws and regulations, including Prohibitions & Restrictions ("Trade Laws"). The supplier in particular ensures that its beneficial owner(s), all its agents and any other subcontractors used are not listed on any applicable sanctions lists.

**MONEY LAUNDERING & FINANCIAL RECORDS**

The supplier shall comply with applicable laws and regulations aimed to prevent and combat money laundering. The supplier shall maintain financial records and reports according to applicable laws and regulations.

**FREE COMPETITION**

The supplier shall comply with applicable competition and anti-trust laws and regulations.

**CONFLICTS OF INTEREST**

The supplier shall immediately disclose any actual or potential conflict of interest related to its activities with Bloq.it.

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**ENVIRONMENT**

The supplier shall comply with all applicable environmental laws, regulations and standards as well as implement an effective system to identify and eliminate potential hazards to the environment.

**CONFLICT MINERALS**

The supplier shall comply with all applicable laws and resulting due diligence obligations with respect to the sourcing of minerals and materials from conflict affected regions and high-risk areas, which may contribute to human rights abuses, corruption, the financing of armed groups or similar negative effects.

**COMMUNITY OUTREACH**

Bloq.it encourages suppliers to engage in initiatives and activities that reflect the UN Sustainable Development Goals.

**BUSINESS CONTINUITY PLANNING**

The supplier shall be prepared for any disruptions of its business. This preparedness includes business continuity plans that protect both employees as well as the environment from the effects of possible serious disruptions that may arise within the domain of operations.

**BUSINESS PARTNER DIALOGUE**

The supplier shall implement equivalent standards to the ones laid out in this Code for its own suppliers, as part of fulfilling their contractual obligations.

**RESPECT AND DUTY OF CARE**

The supplier is required to act and interact with respect and in good faith with employees of Bloq.it.

When using property or materials that carry a Bloq.it trademark or brand, all suppliers shall exercise particular care as any of their actions or activities may be associated with Bloq.it. Any unauthorised use of branded or trademarked materials or equipment is to be avoided.

**REPORTING IRREGULARITIES**

Bloq.it encourages anyone who wishes to report any violations to write an e-mail to [whistleblowing@bloq.it](mailto:whistleblowing@bloq.it).

**CONTINUOUS IMPROVEMENT**

The supplier shall feel encouraged to proactively approach Bloq.it with innovative initiatives able to contribute to further social, economic or environmental improvement.

### 3.Document Review

Document Owner(s):			Legal	
Version	Reviewed by	Approved by	Date Approved	Changes
1.0	Head of Safety, Sustainability and Risk	Head of Legal	15/12/2025	- Document migrated into IMS.